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September 30, 2005

Marlene H. Dortch
Secretary – Federal Communications Commission
445 12th St. S.W.
Washington, D.C. 20554

RE: Adak Eagle Enterprises, LLC d/b/a Adak Telephone Utility - Petition for
Waiver of the Commission's Rules to Obtain Accelerated USF Support and to
Participate in NECA Pools and Tariffs, CC Docket No. 96-45

Dear Ms. Dortch,

On February 9, 2005, Adak Eagle Enterprises, LLC d/b/a Adak Telephone Utility ("Adak") filed a petition for waiver¹ to allow it to obtain accelerated universal service support effective January 1, 2005 and to participate in NECA pools and tariffs. Adak filed a supplement to its petition² on June 6, 2005, to advise the Federal Communications Commission (FCC) that the Regulatory Commission of Alaska (RCA) supported Adak's request and had designated Adak as an eligible telecommunications carrier (ETC) for the purpose of receiving state and federal universal service funds (USF).

Adak is a new local exchange carrier serving a remote island area in Alaska that was previously the site of a U.S. naval installation for many decades, until its closure in 2000. This area has never been part of a study area or been served by an ETC.³ Adak currently serves 150 remaining residents and contractors, who are providing various services such as ordinance disposal, environmental remediation, asset evaluation, and wildlife preservation. Adak sees a potential for future economic expansion and growth in activities such as marine refueling and commercial fishing and fish processing.⁴

¹ Adak Eagle Enterprises, LLC d/b/a Adak Telephone Utility Petition for Waiver, CC Docket No. 96-95, filed February 9, 2005 (*Petition*).

² Adak Eagle Enterprises, LLC d/b/a Adak Telephone Utility Supplement to Petition for Waiver, CC Docket 96-45, filed June 6, 2005 (*Supplement*).

³ Petition at ii.

⁴ *Id.* at 3-4.

In its petitions, Adak seeks a waiver of the definition of “study area” contained in the Appendix – Glossary of Part 36 of the Commission’s rules, to the extent that the Commission deems such waiver necessary given that the this area was previously served by the U.S. military rather than a certificated carrier. Adak also seeks waivers of Part 36 and Part 54 data filing and certification deadlines in order to receive USF for the period beginning January 1, 2005, as well as waivers of Part 69 rules to become a member of NECA and immediately participate in NECA’s pools and tariffs.

NECA has reviewed the petitions and has no objection to inclusion of the new study area in the NECA tariff as this would create no undue administrative burden for NECA.

Sincerely,

/s/ Tracey E.J. Saltenberger
Tracey E.J. Saltenberger

CC: Gary Seigel – Wireline Competition Bureau, FCC
Dean D. Thompson – Kemppel, Huffman and Ellis, P.C.
Kate Giard, Chairman – Regulatory Commission of Alaska
James Rowe, Executive Director – Alaska Telephone Association
Larry Mayes, General Manager – Adak Eagle Enterprises, LLC
Kenneth E. Trout, CPA – KET, Inc.